

MARINO, TORTORELLA & BOYLE, P.C.

KEVIN H. MARINO
JOHN D. TORTORELLA
JOHN A. BOYLE

ROSEANN BASSLER DAL PRA*
EREZ J. DAVY*
ANTHONY J. TAGLIAFERRO
MICHAEL J. FLYNN

ATTORNEYS AT LAW
437 SOUTHERN BOULEVARD
CHATHAM, NEW JERSEY 07928-1488
TELEPHONE (973) 824-9300
FAX (973) 824-8425
www.khmarino.com

875 THIRD AVENUE, 21ST FLOOR
NEW YORK, NEW YORK 10022
TELEPHONE (212) 307-3700
FAX (212) 542-3790
e-mail: jtortorella@khmarino.com
*OF COUNSEL

January 29, 2025

VIA ECF

Honorable Rukhsanah L. Singh, U.S.M.J.
United States District Court
District of New Jersey
Clarkson S. Fisher Building & U.S. Courthouse
402 East State St.
Trenton, NJ 08608

Re: *In re: Insulin Pricing Litigation*, No. 2:23-md-03080-BRM-RLS
MDL No. 3080 | Deadline for Responses to ECF Nos. 397, 398, and 399

Dear Judge Singh:

Pursuant to CMO #17 [ECF 386], Defendants Caremark Rx, LLC, Caremark LLC, and Caremark PCS Health, LLC (collectively, "CVS Caremark"); Express Scripts, Inc., Medco Health Solutions, Inc., and Express Scripts Administrators, LLC (collectively, "Express Scripts"); and OptumRx, Inc. (collectively, the "PBM Defendants") each intend to respond to the Letters Regarding Current Discovery Disputes Involving PBM Defendants [ECF 397], Current Discovery Disputes Involving Express Scripts [ECF 398], and Current Discovery Disputes Involving Optum [ECF 399] that Plaintiffs filed on January 28, 2025, as applicable.

The PBM Defendants each propose to respond separately to Plaintiffs' letters on or before Wednesday, February 5, 2025. If that date is acceptable, we respectfully request that you indicate the Court's approval by so ordering this letter.

Thank you for your consideration of this request and your continuing attention to this matter.

Respectfully submitted,

/s John D. Tortorella

John D. Tortorella
Counsel for Defendants Caremark Rx, LLC,
Caremark LLC, and Caremark PCS Health,
LLC

/s Jason R. Scherr

Jason R. Scherr

*Counsel for Defendants Express Scripts, Inc.,
Medco Health Solutions, Inc., and Express
Scripts Administrators, LLC*

/s/ Thomas P. Scrivo

Thomas P. Scrivo

Counsel for Defendant OptumRx, Inc.

cc: Honorable Brian R. Martinotti, U.S.D.J.
All counsel of record

SO ORDERED:



January 30, 2025

Hon. Rukhsanah L. Singh, U.S.M.J.